



SAMUEL I. PORTNOY
Director

Gibbons P.C.
One Gateway Center
Newark, New Jersey 07102-5310
Direct: (973) 596-4909 Fax: (973) 639-6218
sportnoy@gibbonslaw.com

June 22, 2021

So Ordered this 23rd day of June, 2021,

VIA E-MAIL (lhg_orders@njd.uscourts.gov)

Honorable Lois H. Goodman, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building &
U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Lois H. Goodman, U.S.M.J.

Re: In Re Novo Nordisk Securities Litigation
Master File No.: 17-cv-0209 (BRM) (LHG)

Dear Judge Goodman:

This firm, along with Davis Polk & Wardwell LLP, represents defendants Novo Nordisk A/S, Lars Rebien Sørensen, Jesper Brandgaard, and Jakob Riis in the above-referenced matter. We write, jointly with plaintiffs, to request an extended deadline for the joint sealing motion the parties plan to file in connection with defendants' motion for summary judgment.

Per the briefing schedule currently in place [ECF No. 260], and Local Rule 5.3(c)(2)(ii), the parties' joint sealing motion will be due on July 26, 2021 unless the Court orders otherwise. The parties believe additional time will be needed. Their respective submissions are quite large. Preparing the necessary joint sealing motion will require careful review of hundreds of exhibits, and hundreds of pages of briefing and Local Rule 56.1 statements, to identify the portions warranting permanent seal.

In light of the foregoing, the parties respectfully request that the deadline for their joint sealing motion for defendants' motion for summary judgment be extended to **August 30, 2021**.

If the above proposal meets with Your Honor's approval, we respectfully request that this letter be So Ordered. If it would assist the Court, the parties would be happy to discuss this request with Your Honor.

Respectfully submitted,

s/ Samuel I. Portnoy
Samuel I. Portnoy

cc: All Counsel of Record (*via email*)